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*Attorneys for Defendants, BANK OF GEORGE
and T. RYAN SULLIVAN*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

STEVEN TRANG, an individual,

Plaintiff,

vs.

BANK OF GEORGE, a Domestic
Corporation; and T. RYAN SULLIVAN
in his individual and professional capacity,

Defendants.

BANK OF GEORGE, a Domestic
Corporation,

Counterclaimant,

vs.

STEVEN TRANG, an individual,

Counterdefendant.

Case No.: 2:17-cv-00162-APG-EJY

**STIPULATION FOR EXTENSION OF TIME
TO FILE RESPONSIVE PLEADING
PURSUANT TO
FRCP 6(b)(1)(A) AND LR IA 6-1
(FIRST REQUEST)**

COMES NOW, Plaintiff, Steven Trang (hereinafter, "Trang"), by and through his counsel of record, Andre Lagomarsino, Esq. of Lagomarsino Law, and Defendants, Bank of George, a Nevada corporation (hereinafter, "Bank of George") and T. Ryan Sullivan, by and through their counsel of record, Richard I. Dreitzer, Esq. and Kelly Peters, Esq. of Fennemore Craig, P.C., and hereby stipulate to an extension of time to on or before May 27, 2022, for Bank

1 of George to file a responsive pleading to ECF #72. This is the parties' first request to extend the
2 responsive pleading deadline.

3 Bank of George filed Amended Counterclaims against Mr. Trang on March 25, 2022
4 (ECF #70), which Mr. Trang then moved to dismiss on April 14, 2022 (ECF #72). Currently,
5 Bank of George's deadline to respond to the Motion to Dismiss is April 28, 2022. The parties
6 have agreed to extend this deadline by 29 days on account of the fact that lead counsel for Bank
7 of George is in the midst of a multi-week trial in one matter followed by a week of depositions in
8 another.

9 The parties nonetheless have conferred and anticipate resuming discovery. To that end,
10 they filed their Amended Stipulated Discovery Plan and Scheduling Order (ECF #73) and are in
11 the process of scheduling depositions. As such, counsel for Plaintiff and counsel for Defendants
12 agree that neither side will suffer prejudice from this Stipulation for Extension of Time.

13 Therefore, Plaintiff and Defendants respectfully request that Bank of George's deadline
14 to respond to the Motion to Dismiss (ECF #72) be extended from April 28, 2022, to on or before
15 May 27, 2022.

16 **IT IS SO STIPULATED.**

17 Dated this 21st day of April, 2022.

18 **FENNEMORE CRAIG, P.C.**

19 By: /s/ Kelly Peters

20 RICHARD I. DREITZER, ESQ.

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and T. RYAN SULLIVAN*


1 Dated this 21st day of April, 2022.

2 **LAGOMARSINO LAW FIRM**

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12 *Attorneys for Plaintiff STEVEN TRANG*

13 **IT IS SO ORDERED.**

14 By: 
15 **UNITED STATES DISTRICT COURT JUDGE**
16 **DATED: May 2, 2022**